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Federal Communication Commission

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Federal Communications Commission  
Office of Secretary

January 25, 2006

Ms. Monica Desai  
Chief, Consumer & Governmental Affairs Bureau  
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Washington, DC 20554

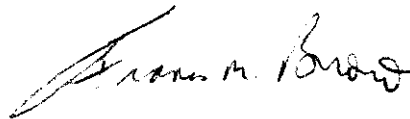
Re: *In re Telecommunications Relay Services and Speech-to-Speech Services for  
Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123  
VRS Certification Application of Snap Telecommunications, Inc.

Dear Ms. Desai:

Snap Telecommunications, Inc. ("Snap") submits this application for certification as a video relay services ("VRS") provider eligible for reimbursement from the Interstate Telecommunications Relay Services Fund ("TRS Fund"). This application is filed pursuant to the new Commission rule (47 C.F.R. § 64.605(a)(2)) adopted in FCC Order 05-203, released on Dec. 12, 2005, in the above-captioned proceeding. Enclosed are also two (2) copies of the application materials.

Should there be any questions regarding the certification documents, please do not hesitate to contact me.

Respectfully submitted,



Francis M. Buono  
Counsel for Snap Telecommunications, Inc.

Enclosures

cc: Marlene H. Dortch, Commission Secretary (w. encl.)  
Thomas Chandler, Chief of the Disabilities Rights Office (w. encl.)  
Jay Keithley, Deputy Bureau Chief (Policy) (w. encl.)  
Gregory Hlibok, Disabilities Rights Office (w. encl.)

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Federal Communications Commission  
Office of Secretary

Telecommunications Relay Services and )  
Speech-to-Speech Services for Individuals with )  
Hearing and Speech Disabilities )  
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VRS Certification Application )

CG Docket No. 03-123

# APPLICATION OF SNAP TELECOMMUNICATIONS, INC. FOR CERTIFICATION AS A VIDEO RELAY SERVICE PROVIDER

January 25, 2006

## TABLE OF CONTENTS

<b>I.</b>	<b>INTRODUCTION.....</b>	<b>1</b>
<b>II.</b>	<b>SNAP'S RESPONSES TO THE COMMISSION'S EIGHT CERTIFICATION TOPICS.....</b>	<b>3</b>
<b>A.</b>	<b>Description of the Form of TRS to be Provided by Snap (i.e., VRS).....</b>	<b>3</b>
<b>1.</b>	<b>Description of Snap Telecommunications, Inc. and its Parent, Aequus Technologies Corp.....</b>	<b>3</b>
<b>2.</b>	<b>Description of Snap's VRS Service .....</b>	<b>5</b>
<b>B.</b>	<b>Description of How Snap Will Comply with All Non-Waived Mandatory Minimum Standards Applicable to VRS.....</b>	<b>11</b>
<b>C.</b>	<b>Snap's Procedures for Ensuring Ongoing Compliance with Applicable VRS Rules .....</b>	<b>11</b>
<b>D.</b>	<b>Snap's Complaint Procedures .....</b>	<b>13</b>
<b>E.</b>	<b>No Differences from Mandatory Minimum Standards Applicable to VRS Other Than Those That <i>Exceed</i> the Minimum Standard .....</b>	<b>14</b>
<b>F.</b>	<b>Statement Asserting Compliance with Mandatory Minimum Standards.....</b>	<b>14</b>
<b>G.</b>	<b>Common Carrier Status of Snap.....</b>	<b>15</b>
<b>H.</b>	<b>Statement Asserting Compliance with the Commission's Filing Requirements for VRS Providers.....</b>	<b>16</b>
<b>III.</b>	<b>CONCLUSION .....</b>	<b>16</b>

Exhibit A	Certificates of Incorporation
Exhibit B	Aequus/Snap Telecommunications, Inc.'s Executive Team
Exhibit C	Motorola Ojo™ Product Data Sheet
Exhibit D	Statement of Compliance with Mandatory Minimum Standards Applicable to VRS
Exhibit E	South Carolina Public Service Commission Order Granting Certificate of Public Convenience and Necessity to Snap Telecommunications, Inc. (then "USA Video Relay, Inc.")
Exhibit F	Snap Telecommunications, Inc.'s Interconnection Agreement with BellSouth

Exhibit G	South Carolina Public Service Commission Order Approving Snap Telecommunications, Inc.'s Interconnection Agreement with BellSouth
Exhibit H	Snap Telecommunications, Inc.'s Tariff as Filed with the South Carolina Public Service Commission
Exhibit I	Amendment of Snap Telecommunications, Inc.'s Articles of Incorporation Reflecting Name Change
Exhibit J	FCC Form 499-A New Carrier Registration of Snap Telecommunications, Inc.

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 In the Matter of )  
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 Telecommunications Relay Services and )  
 Speech-to-Speech Services for Individuals with )  
 Hearing and Speech Disabilities ) CG Docket No. 03-123  
 )  
 VRS Certification Application )

Pursuant to the Commission’s Report and Order and Order on Reconsideration adopted in the above-captioned proceeding and released on December 12, 2005,<sup>1</sup> and 47 C.F.R. §§ 64.604(c)(5)(iii)(F)(4) and 64.605(b)(2), Snap Telecommunications, Inc. (“Snap”) hereby submits its application for certification as a Video Relay Services (“VRS”) provider eligible to receive cost reimbursement from the Interstate Telecommunications Relay Services Fund (“TRS Fund”).

Snap is a wholly owned subsidiary of Aequus Technologies Corp. (“Aequus,” pronounced “ē kwus”), a company with a long-standing commitment to removing barriers and enabling access for people with physical and cognitive disabilities. Snap’s entry into VRS comprises a key component of Aequus’ mission of applying innovative

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technology to improve access for the hearing- and speech-impaired community. As explained below, the Commission's certification of Snap will foster greater competition, innovation, service quality enhancements, and consumer choice in the VRS industry. Additionally, Snap, along with its parent corporation, Aequus, is ideally situated to perform consumer outreach, not only to educate users on the benefits of VRS but also, more generally, to drive further deployment of broadband.

The instant application demonstrates Snap's eligibility and fitness to provide VRS and receive reimbursement from the TRS Fund. Below, and in the attached Exhibits, Snap provides information and documentation with respect to the eight specific topics that the *Certification Order* requires all applicants to address, namely:

- 1) a description of the VRS service that Snap will provide;
- 2) a description of how Snap will meet all non-waived mandatory minimum standards applicable to VRS;
- 3) a description of Snap's procedures for ensuring ongoing compliance with all TRS rules applicable to VRS;
- 4) a description of Snap's complaint procedures;
- 5) a description of any area in which Snap's service will differ from the Commission's applicable mandatory minimum standards for VRS;
- 6) a statement asserting that any difference between Snap's VRS service and the applicable mandatory minimum standards will not violate such mandatory minimum standards;
- 7) a demonstration of Snap's status as a common carrier; and
- 8) a statement that Snap will file annual compliance reports demonstrating Snap's continued compliance with these rules.<sup>2</sup>

Given that Snap provides detailed answers and documentation in response to each of these eight topics, and demonstrates the significant benefits to competition, innovation,

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<sup>2</sup> See *Certification Order* ¶ 22.

and consumer choice that will result from Snap's entry into the VRS marketplace, Snap respectfully urges the Commission to expeditiously grant this application, so that Snap will be eligible for VRS cost reimbursement from the Interstate TRS Fund.

## **II. SNAP'S RESPONSES TO THE COMMISSION'S EIGHT CERTIFICATION TOPICS**

### **A. Description of the Form of TRS to be Provided by Snap (*i.e.*, VRS)**

Snap will provide video relay services. Below, Snap describes the corporate and organizational structure of Snap and its parent corporation, Aequus Technologies Corp. Snap then describes the VRS service to be offered, including the advanced and innovative VRS technology Snap will employ in providing this service.

#### **1. Description of Snap Telecommunications, Inc. and its Parent, Aequus Technologies Corp.**

Snap Telecommunications, Inc. is a wholly owned subsidiary of Aequus Technologies Corp. ("Aequus"), a Delaware corporation founded in 2001 with the goal of providing innovative products and services designed to enable accessibility to information for people with physical and cognitive disabilities. Primarily working with corporate, government, and educational clients, Aequus provides complete technological solutions that facilitate equal access for persons with disabilities to pursue school, work, and life opportunities, so that they will be measured based solely on their ability.<sup>3</sup>

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<sup>3</sup> To date, Aequus's primary business has been in the publishing realm. The Aequus Publishing unit works with corporate, education, and government agencies to create accessible, digital content that can be rendered in a variety of formats for people with and without special needs. Aequus seeks to position itself as the predominant supplier of applications, tools, and services that enable the conversion and delivery of educational instructional materials for all children through digital or electronic means (as opposed to through hardcopy textbooks). Towards this end, Aequus has created relationships with several of the largest book publishers in the world, and has funded various pilot tests to evaluate and demonstrate the success of improved learning outcomes when the publisher's traditional hardcopy content is delivered via Aequus' AspireReader talking book platform.

An underlying driver of Aequus Publishing's plan is that accessibility is good for everyone, not only for persons with disabilities. For example, all students can use and benefit from new versions of

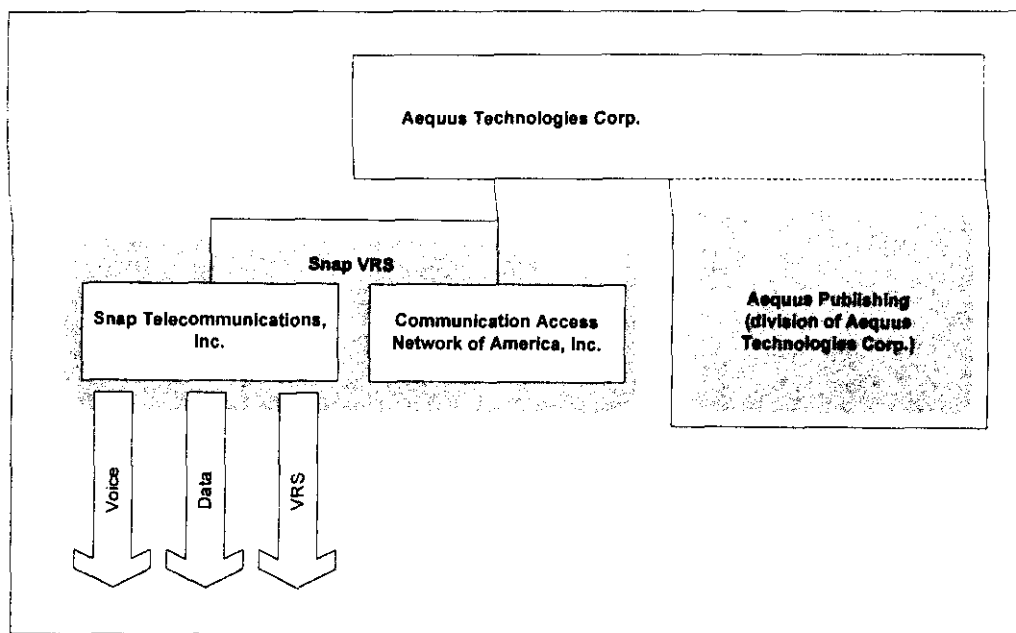
Snap is a competitive local exchange carrier, certificated by the South Carolina Public Service Commission to provide common carrier resale of telecommunications services. As a common carrier, Snap has the statutory responsibility to provide functionally equivalent telecommunications services to the hearing- and speech-impaired community. Snap has partnered with Communication Access Network of America, Inc. ("CAN"), which has provided sign language interpreting for over nine years, in order to provide VRS. CAN offers both on-site and remote video-based service with forty-five certified interpreters, currently operating in South Carolina, Georgia, Tennessee, Maryland, the District of Columbia, and Virginia. In September 2005, Aequus acquired both South Carolina corporations, as wholly owned subsidiaries, to take advantage of the opportunity to extend its mission into VRS and support the rapid growth of Snap in the VRS market.<sup>4</sup>

As explained below, Snap will leverage Aequus' exclusive relationship with Motorola to distribute the Ojo™ video phone (<http://www.motorola.com/ojo>) to its deaf, hearing-impaired, and speech-impaired VRS customers, so they may benefit from this revolutionary new technology. Snap will contract with CAN in order to provide interpreting services, bringing much-needed additional interpreters to serve VRS customers. The certificates of incorporation for Snap, CAN, and Aequus are attached in Exhibit A. Below is a diagram of the current corporate structure.

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textbooks that afford varying media and learning styles (visual, audible, text highlighting, etc.), multiple languages (foreign language integration, English as a second language), and multimedia integration (video captions and graphical descriptors). Aequus is leading the transition from "accessibility as an afterthought" to "built-in accessibility" by creating solutions that both solve accessibility problems for people with disabilities and offer viable new listening, viewing, and communication styles for everyone. For more information about Aequus, please visit <http://www.aequustechnologies.com>.

<sup>4</sup> See Press Release, Aequus Technologies Corp., *Aequus Announces the Acquisition of Snap Telecommunications, Inc., Formerly Known as USA Video Relay Services* (Oct. 26, 2005), available at [http://www.aequustechnologies.com/news\\_article.asp?id=3](http://www.aequustechnologies.com/news_article.asp?id=3).



**Figure 1. Corporate Structure of Aequus Technologies Corp.**

Together, Snap, Aequus, and CAN possess synergies in both resources and business strengths that present an unprecedented opportunity to bring VRS to a wide audience of deaf, hearing-impaired, and speech-impaired individuals. The Aequus/Snap executive team is listed in Exhibit B. Certification of Snap will benefit the public interest in multiple ways. For example, as explained below, Snap intends to bring additional innovation and competition to the VRS marketplace.

## **2. Description of Snap's VRS Service**

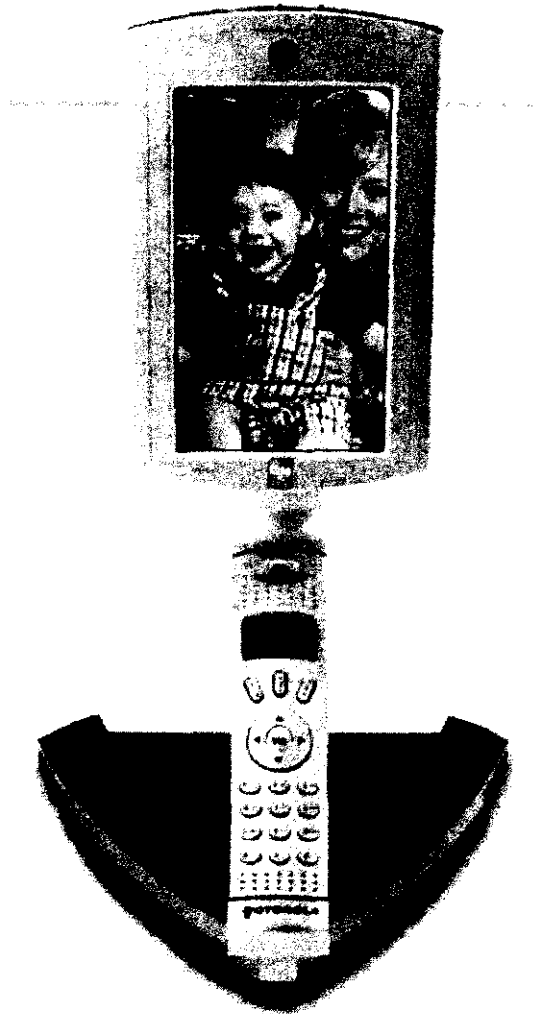
Snap will establish VRS call centers that will have staff and equipment sufficient to handle the volume of VRS calls forecasted for its first year of operations and in accordance with the Commission's minimum speed-of-answer regulation. As call volumes increase, Snap will add and/or expand call centers and its base of interpreters to maintain high-quality service. Snap's interpreters will possess certified fluency in various types of sign languages and will comply with all federal requirements for confidentiality and professionalism. Call centers will be open seven days a week, 24

hours a day. Customer service will also be available seven days a week, 24 hours a day, to handle questions and complaints. This new VRS presence will afford the hearing- and speech-impaired community greater access to innovative VRS services and technologies and the ability to ensure that its citizens are receiving the highest quality services.

More Advanced, Consumer-Friendly Video Phone. Current providers of VRS use standard H.323 web cameras and/or D-Links. These products have inherent limitations and, therefore, can only offer inferior transmissions and video quality. They transmit video in a choppy manner, due to latency issues, information loss, and jitter, and such poor video quality can negatively affect the accuracy of communication. Furthermore, they are standalone products, not integrated with the home or work telephone system, so their utility is diminished in homes where hearing persons live with the VRS user.

By contrast, Snap will make use of an advanced video phone using breakthrough technology — the Ojo™ (<http://www.motorola.com/ojo>) — that is far superior in quality, user-friendliness, performance, and efficiency than anything currently in the VRS marketplace. The Ojo also boasts true plug-and-play installation, operating seamlessly and immediately even in complex, corporate IT environments. Product data sheets for the Ojo are attached as Exhibit C. The Ojo will implement leading industry standards DOCSIS, SIP, and PacketCable™, and will use a regular telephone number (rather than an IP address), so that it is easily accessible from either a video call or a TTY call. The Ojo has video mail functionality comparable to the standard telephone answering machine combination. And, because the Ojo uses advanced transmission and error concealment technologies, it provides superior “true to life” video quality at a lower data

rate (110 Kbps) than existing video phones, which alleviates the need to purchase an expensive “business class or premium” broadband service.<sup>5</sup>



**Figure 2. Sample Illustration of the Ojo Video Phone**

In short, the Ojo is differentiated, both from competitors and from previous efforts at personal video telephony, by providing smooth (no perceptible latency) communication, interoperation with the public switched telephone network, wireless implementation, easy integration with both cable and DSL broadband networks, and a

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<sup>5</sup> See Craig Ellison, *Motorola Ojo Personal Video Phone*, PC Magazine (Jun. 22, 2005), available at <http://www.pcmag.com/article2/0,1895,1834547,00.asp>.

highly styled ergonomic design for personal viewing satisfaction. For a live demo of the Ojo, as well as additional information and specifications, see

<http://www.motorola.com/ojo>.

Enhanced VRS Features. Snap also plans to offer enhanced features that current VRS competitors have not yet deployed (but are commonplace for traditional telephone users), including picture caller ID, 711 VRS, full-duplex audio and video, and built-in video mail similar in function to a telephone/answering machine combination available in the market today for use by non-VRS users. In short, grant of this application will help propel service feature innovation in the VRS market.<sup>6</sup>

Greater Outreach to the Hearing-Impaired Community. Snap intends to leverage its parent company's expertise in the broader education and digital enabling technology arenas to perform outreach to the hearing-impaired community. For example, Snap plans to conduct trials of placing public video telephone booths in local communities. The outreach campaign targets the next generation of deaf and hard-of-hearing citizens with the goal of providing the public with information on how they can utilize the telephone system. The locations of the public video telephone booths will be determined in partnership with organizations such as state Deaf Associations and Goodwill Industries International, which operates over 2,000 locations in North America. The goal is to better educate the public about the myriad of service and technology options available, which could help improve their communications capabilities and quality of life.

Additional Qualified VRS Interpreters. Through CAN, which possesses longstanding ties to the professional community of sign language interpreters (*see*

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<sup>6</sup> See *Certification Order* ¶ 21 ("In addition, we anticipate that new providers will bring innovation to the provision of VRS and IP Relay, both with new equipment and new service features.").

<http://www.caninterpreters.com/>), Snap will offer access to a new network of experienced interpreters.<sup>7</sup> This will provide a significant benefit to VRS users, particularly in light of *the current national shortage of VRS interpreters and the resultant problems such as unacceptable call connection wait times*. In addition, Snap is committed to assist in maintaining and increasing the supply of qualified interpreters by funding local scholarships at universities and schools for the deaf and other assistance for sign language interpreter education near its call centers. Snap will work with approximately five to ten interpreters on a rotating basis to provide internships and job experience. Snap plans to hire graduates of this program into full-time positions that offer competitive compensation.

Greater VRS Competition. Additionally, Snap will bring much-needed competition to the VRS industry. Today's VRS marketplace is characterized by a monopoly provider with over 66% of the VRS market<sup>8</sup> and five other fledgling companies.<sup>9</sup> New competition is crucial to prevent existing providers from further

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<sup>7</sup> These interpreters have acquired significant expertise that will prove invaluable in the VRS area from their work in a similar area, namely Video Remote Interpreting ("VRI"). VRI uses videoconferencing technologies to access sign language interpreting services without an interpreter on site. VRI is a service that is used when an interpreter cannot be physically present to interpret for two persons who are together at the same location (for example, at a meeting or in a doctor's office). In that situation, an interpreter at a remote location may be utilized via a video connection. Snap has contracted with the state of Georgia to provide VRI for the Georgia Department of Labor vocational rehabilitation staff and with Samford University's McWhorter School of Pharmacy in Birmingham, Virginia. VRS differs from VRI in that VRS is intended to function solely as telephone communications for the hearing- or speech-impaired. *See Public Notice, FCC, Federal Communications Commission Clarifies That Certain Telecommunications Relay Services (TRS) Marketing And Call Handling Practices Are Improper And Reminds That Video Relay Service (VRS) May Not Be Used As A Video Remote Interpreting Service*, 20 FCC Rcd. 1471, at 5 (2005). Snap plans to leverage the expertise gained from its VRI experience to provide more competitive and higher-quality VRS.

<sup>8</sup> *See Hands On Ex Parte Letter*, CG Docket No. 98-67 (Apr. 28, 2005), *available at* [http://gulfoss2.fcc.gov/prod/ecfs/retrieve.cgi?native\\_or\\_pdf=pdf&id\\_document=6517587604](http://gulfoss2.fcc.gov/prod/ecfs/retrieve.cgi?native_or_pdf=pdf&id_document=6517587604).

<sup>9</sup> The current list of VRS providers across the United States includes 1) Communication Access Center for the Deaf and Hard of Hearing ("CAC") (<http://www.caedlh.org>) (CAC was certified by Michigan in 2002 under a different name, Statewide Services for the Hearing Impaired, Inc.); 2) Communications Services for the Deaf ("CSD") (<http://www.c-s-d.org> also <http://www.sprintvrs.com/>)

solidifying entrenched positions with little incentive to improve their service. Snap is poised to bring immediate new VRS competition, which will increase consumer choice, reduce answer times, improve VRS technologies, foster enhanced features and functionality, and provide access to a greater pool of highly qualified interpreters, as described above.<sup>10</sup>

Greater Broadband Deployment. VRS is an additional compelling application for broadband networks. The FCC has recognized the potential of VRS to stimulate greater broadband deployment: “[A]s the Commission embarks on a broader initiative to stimulate the deployment of broadband services, we are mindful that VRS can improve existing services for persons with disabilities and can be a demand driver for broadband connections.”<sup>11</sup> Snap’s entry into the VRS marketplace will have a marked effect on broadband deployment, particularly given the technology and service enhancements it will introduce as described above.<sup>12</sup>

For more information on Snap’s VRS offerings, please visit

<http://www.snapvrs.com>.

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(CSD is subcontracted to Sprint, a certified state TRS provider. CSD is not authorized to draw directly from the Interstate TRS Fund as a subcontractor; rather, Sprint draws from the Fund and reimburses CSD); 3) Hamilton Telecommunications (<http://www.hamiltonrelay.com>) (Hamilton is a TRS provider, providing TRS for a number of states already. Because it already had state certification as a TRS provider, its VRS operations did not have to be separately certified); 4) Hands On Video Relay Services, Inc. (“HOVRS”) (<http://www.hovrs.com>) (HOVRS subcontracted to AT&T and MCI, which are certified state TRS providers. It was also certified by the state of Washington in 2003); 5) Nordia (<http://www.myrelay.com>) (Nordia is a certified TRS provider, based in Canada. Because it has state certification as a TRS provider (in California at least), its VRS operations did not have to be separately certified); and 6) Sorenson Media (<http://www.sorensonvrs.com>) (Sorenson was certified by Utah in 2003).

<sup>10</sup> See *Certification Order* ¶ 21 (“Second, this *Order* will enhance competition in the provision of VRS and IP Relay by permitting new entities to offer service, thereby giving consumers greater choice.”).

<sup>11</sup> *In re Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report & Order, Order on Reconsideration, and Further Notice of Proposed Rulemaking, 19 FCC Rcd. 12475, ¶ 243 (2004).

<sup>12</sup> See *Certification Order* ¶ 21 (“Finally, and more broadly, because VRS requires broadband Internet service, new VRS providers may stimulate greater broadband deployment.”).

**B. Description of How Snap Will Comply with All Non-Waived Mandatory Minimum Standards Applicable to VRS**

Snap will meet or exceed all FCC non-waived mandatory minimum standards applicable to VRS. Please see Exhibit D for a list of all such applicable standards and a description of how Snap will meet or exceed those standards.

**C. Snap's Procedures for Ensuring Ongoing Compliance with Applicable VRS Rules**

Snap will have a Compliance Officer as a central member of its executive team. The Compliance Officer will oversee all regulatory compliance efforts, functioning as an independent and objective manager who (1) reviews and evaluates compliance issues/concerns within the organization, (2) ensures that the Board of Directors, management, and employees are in compliance with the rules and regulations of the Commission, that company policies and procedures are being followed, and that behavior in the organization meets the company's standards of conduct, and (3) develops appropriate responses to any issues or concerns that may arise. The Compliance Officer will be authorized to implement all necessary actions to ensure achievement of the objectives of an effective compliance program.

Specifically, the Compliance Officer will bear responsibility for all aspects of regulatory compliance with the applicable VRS rules and will therefore develop, initiate, maintain, and revise policies and procedures to ensure the ongoing compliance of Snap's VRS operations with all of the Commission's applicable non-waived mandatory minimum standards under 47 C.F.R. § 64.604. Toward this end, the Compliance Officer will undertake the following:

- work with the Human Resources Department, and others as appropriate, to develop an effective compliance training program, including appropriate

introductory training for new employees, as well as ongoing training for all employees and managers;

- institute and maintain an effective compliance communication program for the organization, which will include compliance violation reporting guidelines, *educating employees on the standards of conduct*, and *educating all staff on new and existing compliance issues and related policies and procedures*;
- develop and periodically review and update CA standards of conduct to ensure continuing currency and relevance in providing guidance to management and employees;
- collaborate with other departments (*e.g.*, Customer Service or Product Development, etc.) to address potential or existing compliance issues;
- respond to alleged violations of rules, regulations, policies, procedures, and standards of conduct by evaluating or recommending the initiation of investigative procedures;
- develop and oversee a system for uniform handling of any such violations;
- monitor customer service to remain abreast of the status of all compliance activities and to identify trends and potential areas of vulnerability and risk;
- develop and implement corrective action plans for resolution of problematic issues and provide general guidance on how to avoid or deal with similar situations in the future;
- consult with legal counsel as needed to resolve difficult legal compliance issues;
- provide reports on a regular basis, and as directed or requested, to keep senior management informed of the operation and progress of compliance efforts;
- report violations or potential violations to the Commission as appropriate and/or required, and submit annual compliance filings and complaint logs as required by the Commission's rules; and
- ensure that all newly hired CAs possess the necessary certifications.

Finally, the Compliance Officer will have significant input into new product development to ensure regulatory compliance of ongoing innovation. In short, given this extensive compliance program, particularly when combined with the complaint procedures described in the next section, Snap has established that it will make available

adequate procedures and remedies for ensuring compliance with the requirements of § 64.605 and the applicable mandatory minimum standards in § 64.604.

**D. Snap's Complaint Procedures**

Snap will make available a toll-free customer service line (with telephone, fax, TTY, e-mail, and other access) for questions, comments, and complaints about the Snap VRS service. Customer service will operate 24 hours a day, seven days a week. Snap will make available for all users information and material on how to file a complaint and on Snap's complaint procedures. Customer complaints will be handled in a courteous manner and with prompt responses and appropriate escalation as necessary to correct any complaint caused by VRS personnel or by technical problems within the call centers, equipment, or networks owned or leased by Snap.

Snap will employ customer service representatives who are proficient in sign language, to service its VRS customers directly in their own language. Customers who use spoken language will be able to contact customer service representatives who are able to understand and converse in spoken language with or without reasonable accommodation. Complaints that involve any of the broadband service providers used by VRS customers will be referred to the provider directly.

Snap will record all complaints and resolutions, as well as the time elapsed between the initial complaint and its resolution, in a state-of-the-art database system. Snap will use its complaint database to improve service and may use some of the information to train employees. In this instance, all personal information shall be removed in order to preserve confidentiality.

Snap will comply with FCC rules requiring that legitimate complaints be reported by Snap to the Commission once each year or more frequently if so required.

Snap believes that high-quality customer service is of paramount importance. To this end, Snap intends to be guided by consumer feedback when looking for ways to improve its VRS offerings. Snap will endeavor to participate in state processes that already exist for this purpose under the auspices of State TRS programs if allowed. Additionally, Snap will conduct internal and/or external surveys and evaluations of its VRS service in order to maximize this consumer feedback, enhance its VRS service offerings, and minimize customer complaints.

**E. No Differences from Mandatory Minimum Standards Applicable to VRS Other Than Those That *Exceed* the Minimum Standard**

Snap is not aware of any differences between its VRS services and the Commission's non-waived mandatory minimum standards applicable to VRS other than those that *exceed* the minimum Commission requirements. For example, as noted above, Snap will offer picture caller ID and video mail, which exceed the mandatory minimum standards.

**F. Statement Asserting Compliance with Mandatory Minimum Standards**

As stated in the prior section, Snap is not aware of any problematic differences between its VRS services and the Commission's non-waived mandatory minimum standards applicable to VRS. In fact, as this application demonstrates, Snap's provision of VRS will meet *or exceed* all non-waived operational, technical, and functional minimum standards contained in § 64.604. To the extent any such differences may arise in the future, Snap will inform the Commission and will ensure that such differences do not violate such mandatory minimum standards.

### **G. Common Carrier Status of Snap**

On March 2, 2005, the South Carolina Public Service Commission ("SCPSC") *granted Snap a certificate of public convenience and necessity ("CPCN")* for authority to operate as a common carrier and provide local exchange and intrastate long distance services.<sup>13</sup> The Order granting the CPCN is attached as Exhibit E. Snap has executed an interconnection agreement with BellSouth (attached as Exhibit F). The SCPSC approved the interconnection agreement on June 15, 2005. The SCPSC Order approving the agreement is attached as Exhibit G.<sup>14</sup> Snap's tariff as filed with South Carolina is attached as Exhibit H. Snap will offer local and interstate telecommunications services on a common carrier resale basis to end-user customers. As noted in Exhibit D, as a common carrier, Snap will contribute to the TRS Fund on the basis of its interstate end-user telecommunications services revenues pursuant to the Commission's rules. Snap has filed its new carrier registration with the Universal Service Administrative Company per the Commission's Rules. The Form 499-A is attached as Exhibit J. For more information on Snap's telecommunications service offerings, please see <http://www.snaptelecommunications.com>.

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<sup>13</sup> Snap applied for its CPCN under the corporate name "USA Video Relay, Inc." It has since changed its name to Snap Telecommunications, Inc. by amendment to its Articles of Incorporation. Snap registered the amendment with the South Carolina Secretary of State on April 25, 2005. The amendment and filing are attached as Exhibit I.

<sup>14</sup> The entire contents of Docket Nos. 2004-320-C and 2005-108-C are available at <http://dms.psc.sc.gov/dockets/dockets.cfc?Method=DocketDetail&DocketID=95497> and <http://dms.psc.sc.gov/dockets/dockets.cfc?Method=DocketDetail&DocketID=95657>, respectively.

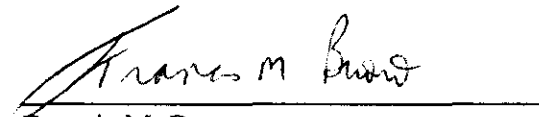
**H. Statement Asserting Compliance with the Commission's Filing Requirements for VRS Providers**

Snap will file annual compliance reports, as required by the Commission, demonstrating Snap's continued compliance with the applicable VRS rules under § 64.604.

**III. CONCLUSION**

For the reasons stated herein, Snap respectfully urges the Commission to expeditiously approve Snap Telecommunications, Inc.'s application for VRS certification under 47 C.F.R. §§ 64.604(c)(5)(iii)(F)(4) and 64.605(b)(2), so that Snap will be eligible for VRS cost reimbursement from the Interstate TRS Fund.

Respectfully submitted,



Francis M. Buono  
Stephanie L. Podey  
Grace Koh\*

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(202) 303-1000

Attorneys for Snap Telecommunications, Inc.

January 25, 2006

\* admitted to practice in New York only.



A

**Exhibit A**

**Certificates of Incorporation**

# *The State of South Carolina*



*Office of Secretary of State Mark Hammond*

## **Certificate of Existence**

**I, Mark Hammond, Secretary of State of South Carolina hereby certify that:**

**COMMUNICATION ACCESS NETWORK OF AMERICA INC.,**  
a corporation duly organized under the laws of the State of South Carolina on July 19th, 2004, and having a perpetual duration unless otherwise indicated below, has as of the date hereof filed all reports due this office, paid all fees, taxes and penalties owed to the Secretary of State, that the Secretary of State has not mailed notice to the Corporation that it is subject to being dissolved by administrative action pursuant to section 33-14-210 of the South Carolina Code, and that the corporation has not filed articles of dissolution as of the date hereof.

Given under my Hand and the Great  
Seal of the State of South Carolina this  
1st day of November, 2005.

  
Mark Hammond, Secretary of State

Note: This certificate does not constitute any representation, undertaking, fee or taxes owed by the Corporation to the South Carolina Tax Commission or whether the Corporation has paid the annual license with the Tax Commission. It is imperative to know whether the Corporation has paid all taxes due to the State of South Carolina, and to file the annual reports, a certificate of compliance must be obtained from the Tax Commission.

# *The State of South Carolina*

## *Office of Secretary of State Mark Hammond* **Certificate of Existence**

I, Mark Hammond, Secretary of State of South Carolina Hereby certify that:

***USA VIDEO RELAY, INC.,***

a corporation duly organized under the laws of the State of South Carolina on **August 5th, 2004**, and having a perpetual duration unless otherwise indicated below, has as of the date hereof filed all reports due this office, paid all fees, taxes and penalties owed to the Secretary of State, that the Secretary of State has not mailed notice to the Corporation that it is subject to being dissolved by administrative action pursuant to Section 33-14-210 of the South Carolina Code, and that the corporation has not filed articles of dissolution as of the date hereof.

Given under my Hand and the Great Seal of  
the State of South Carolina this 6th day of  
August, 2004.

A handwritten signature in black ink that reads "Mark Hammond". The signature is written in a cursive style with a large, stylized "M" and "H".

Mark Hammond, Secretary of State